

From: evelyn\_elder@mail.fws.gov

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Subject: CFBD: Redraft of Purpose & Need

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Rick, Patrick is out of town today so this will not include any of his

comments that he may have on the redraft. Hopefully in the future you

will be able to provide an email copy along with any FAXs that you

send.

This version of the Purpose and Need statement is much improved.

However, I still have some concerns.

General comments: While I agree that a discussion for the CALFED

Bay-Delta Program planning process; mission statment, objectives,

solution principles and the geographic scope of the CALFED Bay-Delta

Program is needed, putting this all before identifying the Purpose and

Need seems like getting the horse before the cart. Things going into

the introduction should include those things which have led to establishing the CALFED Bay-Delta Program. Things like the objectives

and solution principles are the means of trying to reach the project

purpose.

Paragraph 2 which starts "The overall purpose of . . .": I think this is a good statement of the purpose. However ". . . c) reduce the mixmatch between . . ." is awkwardly worded. Aren't we really talking about minimizing the conflicts between the need for water supply and the need for other current and projected beneficial uses in the delta?

I'm assuming that Paragraph 3,4 and 5 are intended to be the need statements.

Paragraph 3: This entire paragraph which appears to discuss ecosystem needs is problematic. It seems to me that the ecosystem need is to stop species decline while minimizing conflicts with other uses. The "ecosystem" aspects are still too tied to flow. Additionally, the delta is in a major flyway. Vegetative communities have been lost as well. There are many other impacts and needs in the system that need to be addressed. If we are only going to address the aquatic ecosystem, then we need to start saying so. Below is suggested wording for your consideration.

Urgent ecological restoration is needed is to stop the decline of fish, wildlife, and plant species dependent on the Bay-Delta system for all or part of their life cycle and to improve their life conditions in a manner that resolves or minimizes to the maximum extent conflicts among other beneficial uses of the Bay-Delta system.

A reliable water supply from the Delta for approximately two-thirds

(is this correct?) of California is a major needed beneficial use of

Delta water. Diversions of water from the Delta for municipal, industrial, and agricultural uses have resulted in altered timing and

quantity of inflow to and outflow from the system, as well as loss of

fish by impingement and entrainment. Current agricultural practices,

levee and channel maintenance, and the introduction of industrial,

municipal, and agricultural toxic discharges have resulted in reduced

terrestrial, riparian, and shallow water habitats available to birds,

mammals and fish as well as the loss of plant species and diversity.

The rapid decline in species, particularly fish, have led to regulatory controls on the export of water from the Delta which in

turn have affected water supply reliability.

I won't take time to comment on the last two paragraphs since you are

waiting for this. As you know water quality is a necessary component

for ecosystem health for birds, plants, and animals, including humans.